UNITED STATES DISTRICT COURT SEALED



UNITED	STATES	OF AMERICA)	
)	criminal no. $13 C/10247$
	v.)	VIOLATIONS:
)	18 U.S.C. § 1542
STEVEN	NOLTE,	a/k/a)	FALSE STATEMENTS IN PASSPORT
GEORGE	FRANCE)	APPLICATION
)	18 U.S.C. § 1028A
)	AGGRAVATED IDENTITY THEFT
)	42 U.S.C. § 408(a)(7)(A)
)	USE OF FALSELY-OBTAINED
)	SOCIAL SECURITY NUMBER

INDICTMENT

COUNT ONE: 18 U.S.C. § 1542 - False Statements in Passport Application

The Grand Jury charges that:

On or about May 11, 2012, at Boston, in the District of Massachusetts,

STEVEN NOLTE, a/k/a GEORGE FRANCE,

defendant herein, did willfully and knowingly make false statements in an application for passport with intent to induce and secure the issuance of a passport under the authority of the United States, for his own use and the use of another, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws.

All in violation of Title 18, United States Code, Section 1542.

COUNT TWO: 18 U.S.C. § 1028A - Aggravated Identify Theft
The Grand Jury further charges that:

On or about May 11, 2012, at Boston, in the District of Massachusetts,

STEVEN NOLTE, a/k/a GEORGE FRANCE,

defendant herein, did, during and in relation to the felony violation of making false statements in a passport application, in violation of Title 18, United States Code, Section 1542, as alleged in Count One, knowingly possess and use, without lawful authority, means of identification of another person.

All in violation of Title 18, United States Code, Section 1028A.

COUNT THREE: 42 U.S.C. § 408(a)(7)(A) - Use of Falsely-Obtained Social Security Account Number To Obtain Benefits

The Grand Jury further charges that:

On or about May 11, 2012, at Boston, in the District of Massachusetts,

STEVEN NOLTE, a/k/a GEORGE FRANCE,

defendant herein, for the purpose of obtaining a benefit to which he was not entitled, to wit, a United States passport issued in the identity of another, did willfully, knowingly, and with intent to deceive, use a social security account number, assigned by the Commissioner of Social Security (in the exercise of the Commissioner's authority under section 405(c)(2) of Title 42 of the United States Code to establish and maintain records) on the basis of false information furnished to the Commissioner of Social Security by him and by any other person.

All in violation of Title 42, United States Code, Section 408(a)(7)(A).

A TRUE BILL

FOREPERSON OF THE GRAND JURY

ROBERT E. RICHARDSON ASSISTANT U.S. ATTORNEY

DISTRICT OF MASSACHUSETTS; Jug 20 , 2013

Returned into the District Court by Grand Jurors and filed.

DEPUTY CLERK

12:00 p.m. 8/20/13